

EXHIBIT 3



October 30, 2020

VIA EMAIL

EXT_Track1BDefendants@jonesday.com

**Re: *In re National Prescription Opiate Litigation*, MDL No. 2804; CT3
Persons and Entities with Relevant Knowledge**

Counsel:

We write on behalf of Trumbull and Lake Counties (“Plaintiffs”) per the Track Three CMO, which orders the parties to “identify persons and entities with relevant knowledge.” *See* Dkt. No. 3325 at E.5.

Plaintiffs identify all “persons and entities with relevant knowledge” in the attached Exhibit 1. In addition to the list of names of persons and entities with relevant knowledge in Exhibit 1, Plaintiffs also incorporate by reference all individuals of the following defendants who were deposed or named in MDL discovery responses by these defendants:

- Allergan
- Actavis
- AmerisourceBergen
- Anda
- Cardinal Health
- Cephalon
- CVS
- Discount Drug Mart
- Endo
- H.D. Smith
- HBC/Giant Eagle
- Henry Schein
- Insys
- Jansen/Johnson & Johnson
- Mallinckrodt
- McKesson
- Par
- Prescription Supply Incorporated
- Purdue
- Rite Aid
- Teva
- Walgreens



- Walmart
- Watson

Plaintiffs also incorporate by reference: (i) any individuals or entities disclosed in its or any other party's discovery responses; (ii) identification of persons or entities with knowledge disclosed by other parties, including Defendants, in these cases; and (iii) each witness who has been or will be noticed or subpoenaed by any party for a deposition in these cases.

Plaintiffs will disclose their Track Three experts according to the schedule set by the Court.

In including an individual or entity in this disclosure, Plaintiffs do not concede that the individual or entity is a proper subject for discovery, deposition, or trial and reserves all objections. Plaintiffs' investigation is ongoing, given the and lack of substantially complete productions from Defendants and ongoing discovery disputes. Plaintiffs reserve all rights to amend this disclosure to add or remove persons and entities with relevant knowledge for any reason, including, but not limited to, in response to ongoing discovery or any rulings or orders that may expand or restrict the issues in the case.

Sincerely,

/s/ Hunter J. Shkolnik

Hunter J. Shkolnik

Frank Gallucci

Salvatore C. Badala

Joseph L. Ciaccio

Counsel for Lake and Trumbull Counties

Exhibit 1

Person/Entity	Title/Entity
Milhoan, Jodie	Trumbull County
O'Shaughnessy, Denise	Trumbull County
Rodgers, Darryl	Trumbull County
Gargano, John	Trumbull County
Biviano, Adrian	Trumbull County
James, Dr. Thomas	Trumbull County
Meszaros, Kathleen	Trumbull County
Schaffner, Timothy	Trumbull County
Tvaroch, Richard	Trumbull County
Jackson, Richard	Trumbull County
Buccino-Arnaut, Gina	Trumbull County
Morrow, Charles	Trumbull County
Villanueva, Tony	Trumbull County
Mason, Daniel	Trumbull County
Cook, Ernest	Trumbull County
Caraway, April	Trumbull County
Thorp, Lauren	Trumbull County
Evans, Keith	Trumbull County
O'Hara, Nicholas	Trumbull County
Smith, Lawrence	Lake County
Galloway, Christopher	Lake County
Matas, Michael	Lake County
DiMare, Joel	Lake County
Komar, Dr. Mark	Lake County
Berry, Craig	Lake County
Battiato, Matthew	Lake County
O'Brien, Lori	Lake County
Tressler, David	Lake County
Rasic, Anne	Lake County
Kowall, Karen	Lake County
Begley, Christopher	Lake County
Brooks, Cynthia	Lake County
Walters, Ronald	Lake County
Snow, Diane	Lake County
Belle, Jeffrey	Lake County
Suchanek, LeAnne	Lake County
Blakely, Damian	Lake County
Lajack, Daniel	Lake County
Gardner, Michael	Lake County

Person/Entity	Title/Entity
Frisone, David	Lake County
Willis, George "Pat"	Lake County
Matteo, Joseph	Lake County
Kimberly Erb	Lake County
Phillips, Pam	Lake County
Fraser, Kim	Lake County ADAMHS
Michelson, Dr. Dennis	Advanced Clinical Consultants
Beck, DDS, Dr. Frank	Mercy Health
First Step Recovery	First Step Recovery
Woodford, Cindy	First Step Recovery
Villaplana, Dr. Luis	Medical Director at Meridian Healthcare
Compass Family and Community Services	Compass Family and Community Services
Caruso, Joseph	Compass Family and Community Services
SOLACE	SOLACE
Spies, Linda	SOLACE
Ohio Board of Pharmacy	Ohio Board of Pharmacy
Pavlich, George	Ohio Board of Pharmacy
Edwards, William "Trey"	Ohio Board of Pharmacy
DiFrangia, William	Ohio Board of Pharmacy
Crossroads Health	Crossroads Health
Hammond, Julie	Crossroads Health
Matoney, Michael	Crossroads Health
Razmjovei, Dr. Karim	University Hospitals/Crossroads Health
Lake Geauga Recovery Centers	Lake Geauga Recovery Centers
Blasko, Melanie	Lake Geauga Recovery Centers
Hanlon, Dave	Lake Geauga Recovery Centers
Signature Health	Signature Health
Lee, Jonathan	Signature Health
Cover2 Resources	Cover2 Resources
McNeil, Greg	Cover2 Resources
Windsor Laurelwood Center for Behavioral Medicine	Windsor Laurelwood Center for Behavioral Medicine
Mccallin, Nicole	Foster Parent
Johnson, Ronna	Competent Caregivers
Parrilla, Kathy	Trumbull County Combined Health District
NACDS	NACDS
Nicholson, Kevin	National Association of Chain Drugstores
Cope, Michelle	National Association of Chain Drugstores
O'Donnell, Tom	National Association of Chain Drugstores

Person/Entity	Title/Entity
Guckian, Sandra	National Association of Chain Drugstores
Bell, Don	National Association of Chain Drugstores
Kleiman, Mary Ellen	National Association of Chain Drugstores
Jaeger, Kathleen	National Association of Chain Drugstores
McCormack, Jill	National Association of Chain Drugstores
Boutte, Christie	National Association of Chain Drugstores
Krese, Chris	National Association of Chain Drugstores
Kelly, Carol	National Association of Chain Drugstores
Tighe, Bill	National Association of Chain Drugstores
Kopple, Chrissy	National Association of Chain Drugstores
Drug Enforcement Administration (“DEA”)	Drug Enforcement Administration (“DEA”)
Mapes, Michael	Former DEA Diversion Investigator
Wright, Kyle	DEA, Staff Coordinator Regulatory Section
Harper-Avila, Stacy	DEA, Section Chief on Quotes
Strait, Matthew	DEA, Senior Policy Advisor
Howard, June	DEA, Program Analyst
Tush, Donald	DEA, Diversion Investigator
Prevoznik, Thomas	DEA, Associate Section Chief for Pharmaceutical Investigations Section of Diversion Control Division
Rannazzisi, Joseph	DEA, Former Head of Office of Diversion Control
Ashley, Demetra	DEA, Former Acting Assistant Administrator
HDA	HDA
Kelly, Patrick	HDA
Gray, John	HDA, President and CEO
Ducca, Anita	HDA Senior Vice President of Regulatory Affairs
Applegate, Mary Dr.	Ohio Department of Medicaid, Medical Director
Wharton, Donald Dr.	Ohio Department of Medicaid, Assistant Medical Director
Buzzeo, Ronald	SOMS Consultant
IQVIA	IQVIA
Hunter, James	IQVIA
Roma, Elise	IQVIA
APAM	APAM
Hagen, Daniecele	APAM
Smith, Todd	APAM
Kulkarni, Kathy	APAM